



Re: MUR 6916
Shayan H. Modarres, Esq.

Response

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From: "Shayan H. Modarres, Esq." <Shayan@ModarresLaw.com>
To: "fhampton@fec.gov" <fhampton@fec.gov>,

Good Afternoon,

Today, I received a letter dated March 2, 2015 in reference to my congressional campaign committee, Supporters of Shayan for Congress. After reading the complaint, my respond by stating the following:

- 1) I am a Florida and Maryland barred attorney and decided to run for US Congress in 2014 for an opportunity to serve my country and the citizens of FL-10.
- 2) I scraped together the little money that I was able to raise to pay for NGP-VAN as a means for donors to make payments through a payment portal on my website.
- 3) I chose NGP-VAN because it appeared most Democratic candidates chose that particular company as their payment portal as well.
- 4) My campaign was never provided any list related products or services nor did it ever receive any unreported contributions of any kind.
- 5) Myself and my staff worked very hard knocking on doors, attending events, making phone calls and reaching out to voters to earn every supporter and contribution that we did receive. Any suggestion that we engaged in any improper or illegal conduct is simply not true.
- 6) The only services we received from NGP VAN was the payment portal, and the system where supporters could log on to my website and sign up to receive emails, notifications or sign up to volunteer. That is the entirety of the services that were provided to us.
- 7) My campaign had access to some voter information that was paid for and received through the State of Florida Division of Elections after we paid the appropriate fee to access the VAN.
- 8) This complaint contains nothing but baseless allegations. It is rather disgusting and disheartening to think that there are people and organizations in our country that would accuse first-time candidates like myself of wrong-doing after my staff and I spent several months busting our butts only for the opportunity to serve the United States of America.
- 9) It is my fervent hope that this Complaint is dismissed in its entirety.

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